

Vincent J. Buono, Jr.  
284 Golf Hills Road  
Havertown, PA 19083

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I am commenting on the Notice of Proposed Rulemaking for RM-11828, and I am also replying to the ARRL Petition FCC ID 1022823795806.

I have been an amateur radio operator for over 52 years and my callsign is WA3ADI. I oppose the subject proposition for the following reasons:

- RM-11828 purports to induct "makers" into the amateur community. It proposes to include people who do not possess the qualifications or training to "make" anything.
- The current Technician test is often obtained by a one weekend crash course in memorization, followed immediately by the test. It is a beginner's license which originally was designed for only 29 MHz and higher.
- I oppose granting additional HF privileges to existing or new Techs without a test which ensures knowledge of basic operating procedures and the sophisticated digital systems currently in use on HF.
- The only reason Technicians have any HF allocations at all is that when the Novice license was abolished, its HF CW privileges rolled into the Technician class. The proper disposition at that time would have been to retain the Novice license as non renewable, and let those people upgrade to Tech or General. RM-11828 only perpetuates the artifacts left behind by the no code licensing changes.
- The Tech license does not cover General Question Pool G2E02(B), G2E03(D), G2E07(A), G2E09(C), G2E10(D), G2E12 (C), G8C06 (B), G8C07 (B), G8C01(B), G1E05(C), G1E11(C), G1E12(A), G1E13(D), which cover essential modern HF digital communications procedures. Without that basic knowledge, interference, improper operation and spectrum sharing, and enforcement problems will result.
- As written by the ARRL, RM-11828 allows an unqualified Technician Licensee to even become a control operator of a Winlink RMS system, essentially an email store and forward repeater, on HF, without any knowledge of its basic functions on a user level. Repeater operation on VHF and UHF uses local propagation. Consequences of incorrect operation on HF are world wide.
- The FCC has not yet rejected or revised the proposals in RM-11708 or Docket 16-239 as currently written. The FCC must immediately dismiss or stay RM-11828 until it has finished work on RM-11708 and 16-239. These important rule

making decisions regarding these powerful digital systems must be resolved first before proceeding on a misguided restructuring which could complicate matters further.

- The ARRL proposes in RM-11828 to grant wide swaths of HF VOICE/DATA spectrum. These proposed HF VOICE allocations are 55% of the General HF VOICE allocations in those bands. The current number of Tech licenses moving into these allocations would effectively DOUBLE the population, resulting in congestion of the VOICE spectrum by those without adequate knowledge of HF procedures. General licensees would likely be adversely effected.
- ARRL ignores that the proposed 80 meter VOICE spectrum is used by traffic nets that may be passing essential messages for relief work. The new Tech population may NOT be involved in such activity, and may create interference to the traffic nets.
- ARRL proposed NO 40 meter Tech VOICE privileges in its earlier unresolved petition RM-11759. It now changes its proposal to include significant portions of an already congested upper 40 meter VOICE segment. At night, the upper 100 KHz of 40 meters is plagued by foreign broadcast interference. One notable example is Radio China 7285 KHz English Language from late in the afternoon well into the evening, which transmits an unnecessarily wide signal. Now ARRL wants in RM-11828 to add to the problem. The lower 100 KHz of 40 meters is even more complicated by IARU region 1 only having that spectrum for DATA and VOICE. There should be NO 40 meter DATA OR VOICE expansion for Techs.
- I am very much FOR the use of amateur radio for legitimate emergency communications, but I am very much AGAINST its exploitation for commercial or illegal use as a free HF email service or private radio network instead of other available commercial email providers like Sailmail or satellite phones.

Thank you very much for your consideration.

Sincerely,

Vincent J. Buono, Jr.